

**United States Environmental Protection Agency
Region VI
POLLUTION REPORT**

Date: Tuesday, April 21, 2009
From: Gary Moore

Subject: Continuation of Actions
Norphlet Chemical Inc.
600 MacMillian Road, Norphlet, AR
Latitude: 33.3093000
Longitude: -92.6560000

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|--------------------------|-----------|----------------------------|-----------|
| POLREP No.: | 3 | Site #: | A6N8 |
| Reporting Period: | | D.O. #: | |
| Start Date: | 4/16/2009 | Response Authority: | CERCLA |
| Mob Date: | 4/16/2009 | Response Type: | Emergency |
| Demob Date: | | NPL Status: | Non NPL |
| Completion Date: | | Incident Category: | |
| CERCLIS ID #: | | Contract # | |
| RCRIS ID #: | | | |

Site Description

Norphlet Chemical Company (NCC) is located outside El Dorado, AR at the location of the former Macmillan Oil Refinery (a previous Non-NPL Removal Action). NCC is a chemical manufacturing facility in the business of producing a refrigerant (HFC-134A) used in automobiles. The primary raw materials used for producing this product is Anhydrous Hydrogen Fluoride, Trichloroethylene, and a catalyst. The company attempted to produce the intended product but was unable to do so. In September 2008, the company laid off all of its employees.

EPA became aware of this facility in March 2009 and immediately informed the ADEQ. EPA offered its assistance if deemed necessary by the ADEQ. On April 15, 2009, DHS conducted an Infrastructure Protection Inspection of the facility and was alarmed with its condition and the fact that it was abandoned. On April 15, 2009, DHS contacted EPA about their concerns with the site. The major concern was that the abandoned site had containers of Anhydrous Hydrogen Fluoride (AHF) and mixtures of AHF, TCE, and intermediate refrigerants. In addition, the condition of these containers were questionable. EPA and DHS contacted State authorities and participated in a call concerning the site. On April 16, EPA received a request from ADEQ to address the situation at the site.

EPA dispatched its START Contractors to begin air monitoring. EPA OSC Jones arrived on-site on Friday, April 17, 2009 and met with Federal, State, County, and City officials and evaluated the site. OSC Jones determined that an Imminent and Substantial Endangerment existed as a result of the abandonment of the facility, the conditions of the tankage, and the close proximity of the school and surrounding residents to the facility. On April 16, 2009, Union County Judge Bobby Edmonds declared an emergency. Because of the emergency order and the close proximity of the site to the school(s), the school was closed for Friday, April 17.

There are 5 tanks of immediate concern that will be addressed by the EPA. These tanks are as follows:

- o Tank TT10 (13,800 gallon capacity) - 13,000 gallons of a liquid mixture; 75% AHF and 25% TCE and intermediate refrigerants;
- o Tank TT11 (13,800 gallon capacity) - 11,000 gallons of a liquid mixture; 4% AHF and 96% TCE and intermediate refrigerants;
- o Tank TT13 (11,550 gallon capacity) - NaF (4500 pounds) and 2,000 gallons of a AHF;
- o Tank TT02 (18,213 gallon capacity): Approximately 2000 gallons of TCE;
- o Tank TT01 (42,000 gallon capacity): 7,800 gallon of 98% AHF

Current Activities

On April 19, 2009, EPA attempted to transfer material from the tanks into tanker trucks. In order to accomplish this, piping was removed from the tanks to allow the connection of a pump and hoses. The transfer operation failed due to pump problems, however, there were no injuries or significant releases of material.

EPA is in the process of obtaining bids for transportation and disposal. It was determined that high pressure intermodal containers was necessary for storage and transport of the AHF Mixture tanks (TT10 and 11) due to the organics within the tanks. Additionally, EPA is in the process of obtaining a pump with viton diaphragms and gaskets to handle the materials.

Planned Removal Actions

EPA anticipates beginning material transfers from the unstable tank TT-11 into high pressure intermodal containers when all equipment has been procured. This transfer is anticipated to begin as early as April 24 depending upon delivery of containers. The transfer will not take place during school hours. Weather conditions are predicted to be such that the town of Norphlet will be downwind of the tanks. START will be conducting air monitoring and sampling during the transfer process. EPA will meet with Local City and County Officials to determine if evacuations will be necessary.

Next Steps

On Wednesday, April 22, 2009, EPA and its contractors will be selecting a transportation and disposal company for the materials. EPA and its Contractors will be preparing transfer plans to satisfy the selected disposal company needs.

EPA will continue to conduct real time air monitoring and sampling activities as necessary until AHF and AHF mixtures are removed.

EPA and its contractors are awaiting the delivery of additional specialized high pressure intermodal containers prior to initiating transfer of TT-10, TT-11, and TT-13.

EPA is awaiting the receipt of railcar to transfer the AHF tank for shipment to a company named Soleil for reuse. Additionally, the EPA is awaiting word on acceptance of the TCE materials by Univar.

EPA will continue to coordinate with the State and Local Officials to ensure that the tanks containing AHF and AHF waste mixture will be removed and disposed of properly.

Key Issues

The facility is located adjacent to a K - 12 school, park, and residents.

This is a serious situation as the facility is abandoned and the company is defunct. Questions have arisen about how a facility of this nature could be allowed to be constructed directly next to a school.

The former plant manager, Vic Forte, is assisting EPA and its contractors in understanding the facility and its operations. It is EPA's understanding that Mr. Forte has been overseeing the facility at his own expense since it was abandoned in September 2008. This assistance has been very helpful to response operations.

www.epaossc.org/Norphle_tChemical_Inc